

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**IN RE LERNOUT & HAUSPIE
SECURITIES LITIGATION**

**CIVIL ACTION NO.
00-11589 (PBS)**

**THIS DOCUMENT RELATES TO:
ALL ACTIONS**

**AFFIDAVIT OF LAKEETA M. KING IN SUPPORT OF THE APPLICATION
FOR THE FINAL APPROVAL OF THE SETTLEMENT**

I, Lakeeta M. King, being duly sworn, declare as follows:

1. I am one of two Claims Administration Supervisors of A.B. Data, Ltd.'s Class Action and Complex Litigation Support Services Division ("A.B. Data") in Milwaukee, Wisconsin. A.B. Data offers a full range of class action and complex litigation support services. My business address is 4057 North Wilson Drive, Milwaukee, Wisconsin 53211. My telephone number is (414) 963-6445.

2. I submit this Affidavit in connection with the application for the final approval of the settlement in the consolidated action entitled *In re Lernout & Hauspie Securities Litigation*, Civil Action No. 00-11589 (PBS), United States District Court, District of Massachusetts, at the request of the Plaintiffs' Counsel.

3. This Affidavit is based upon my personal knowledge and upon information provided by Plaintiffs' Counsel, my associates, and staff.

Affidavit of Lakeeta M. King

In re Lernout & Hauspie Securities Litigation, Civil Action No. 00-11589 (PBS)

4. As set forth in the Court's October 13, 2004 Preliminary Approval Order, A.B. Data, as Claims Administrator, was responsible for effectuating the Notice of the proposed Settlement and distributing the Proof of Claim form to potential Class Members. This Affidavit describes the dissemination of the Notice of Proposed Settlement of Class Action with KPMG LLP, Klynveld Peat Marwick Goerdeler Bedrijfsrevisoren and Paul Behets, Settlement Fairness Hearing and Motion for Attorney's Fees and Reimbursement of Litigation Expenses ("Notice Packet") attached hereto as Exhibit 1. That dissemination consisted of direct mailing of the Notice of Proposed Settlement of Class Action and the Proof of Claim and Release form ("Notice Packets") to known shareholders, nominee holders, and brokers and also broad notice through the use of a paid media in *The Wall Street Journal*, *The Wall Street Journal Europe*, and *De Tijd*.

5. On or about October 22, 2004, A.B. Data received 5,734 shareholders' records ("Database") from the transfer agent. These names were entered into a database for data processing.

6. Also, as part of the mailing, a file was produced from A.B. Data's existing and updated database of the 2,055 largest brokerage firms, banks, institutions and other nominees (the "Broker List").

7. On or about October 22, 2004, A.B. Data printed about 7,789 Notice Packets and prepared the mailing.

8. On October 25, 2004, A.B. Data delivered to the United States Postal Service (USPS) the Notice Packets to be mailed by First Class mail, postage prepaid, to the 5,734 shareholders and the 2,055 brokerage firms, banks, institutions and other nominees.

9. As of November 24, 2004, A.B. Data has mailed by First Class mail 74,882 additional Notice Packets in response to 47 requests of brokerage firms, banks, institutions and other nominees.

10. As of November 24, 2004, A.B. Data has mailed by First Class mail an additional 148 Notice Packets to shareholders per their request via the Lernout and Hauspie toll free help line.

11. Therefore, as of November 24, 2004, a total of 82,819 Notice Packets have been mailed to potential Class Members and nominees by First Class mail.

12. As of November 24, 2004, A.B. Data has received a total of 1,119 Notice Packets marked Undeliverable as Addressed (UAA) pieces. 107 UAA pieces had forwarding addresses from USPS and were remailed. A total of 1,012 Notice Packets remain UAA.

13. A.B. Data contracted with *The Wall Street Journal* to publish Summary Notice in its American national edition, attached as Exhibit 2, and in its European edition, attached as Exhibit 3, on October 22, 2004. Attached hereto as Exhibit 4 is the Declaration of Allison Horton of *The Affidavit of Lakeeta M. King*

Wall Street Journal certifying to the publication of the Summary Notice in its American national edition on Friday, October 22, 2004, which is the highest circulation day for this publication.

Attached as Exhibit 5 is the Declaration of Allison Horton of *The Wall Street Journal* certifying to the publication of the Summary Notice in its European edition on Friday, October 22, 2004, which is the highest circulation day for this publication.

14. On October 18, 2004, A.B. Data forwarded the Summary Notice to Transperfect Translations for translation and proofreading from English into Flemish for Belgium. Translation and proofreading was completed and certified on October 20, 2004. Certification is attached as Exhibit 6.

15. A.B. Data contracted with Publitas North America, United States representative for the Dutch Flemish publication, *De Tijd*, to publish Summary Notice in Flemish for Belgium, attached as Exhibit 7, in the *De Tijd* on October 27, 2004. Attached hereto as Exhibit 8 is the Declaration of James Allen of Publitas North America certifying to the publication of the Publication Notice on October 27, 2004.

16. On October 14, 2004, A.B. Data completed registration of Plaintiffs' Counsels approved official Lernout and Hauspie Class Action Settlement website's domain name lernouthauspiesettlement.com.

17. On October 25, 2004, A.B. Data posted Plaintiffs' Counsels approved official Lernout Class Action Settlement website and uploaded the following documents at

<http://www.lernouthauspiesettlement.com>:

- a. Court-Approved Notice in English;
- b. Court-Approved Proof of Claim and Release form in English;
- c. Summary Notice in English; and
- d. Summary Notice in Flemish for Belgium.

18. On October 25, 2004, website was submitted to main search engines like Google and Yahoo.

19. On October 25, 2004, Plaintiffs' and Defense Counsels were notified of the posting.

20. From October 25, 2004 through November 29, 2004, the website:

- a. had 13,350 hits;
- b. was visited by 1,302 unique visitors; and
- c. the following files were downloaded:

- | | |
|---|-------------|
| i. Notice in English | 483 times |
| ii. Proof of Claim form in English | 1,075 times |
| iii. Summary Notice in English | 251 times |
| iv. Summary Notice in Flemish for Belgium | 336 times |

21. On or about October 22, 2004, a toll-free number was established with an automated voice response mail system and live operators. The automated attendant answered the calls and presented callers with a series of choices to respond to basic questions and collect the callers'

names, addresses and telephone numbers. If callers needed further help, they had an option to be transferred to a live operator.

22. From October 25, 2004 through December 1, 2004, A.B. Data received 151 phone calls and 22 voicemail messages that were returned.

23. As of December 1, 2004, A. B. Data has received 445 claims, 96 of which were filed electronically.

24. As of December 7, 2004 A.B. Data has received the following correspondence:

- a. four incomplete Requests for Exclusion, attached as Exhibit 9;
- b. 155 complete Requests for Exclusion, attached as Exhibit 10; and
- c. no Objections from Class Members.

25. A.B. Data mailed three requests to correct deficient exclusions, correspondence attached as Exhibit 11, and as of December 1, 2004, A.B. Data has not received back correspondence that would correct any of the four previously mentioned deficient exclusions.

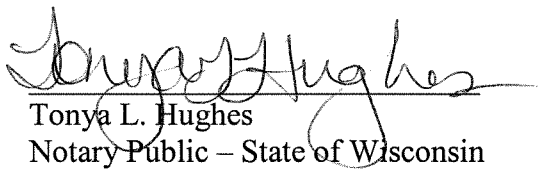
26. A.B. Data respectfully requests reimbursement of fees and expenses incurred in connection with providing the Notice to the Class and Claims Administration. Invoice #103034 for the amount of \$190,262.72 is attached as Exhibit 12.

I declare under penalty of perjury that the foregoing is true and correct. If called as a witness, I could and would competently testify thereto.

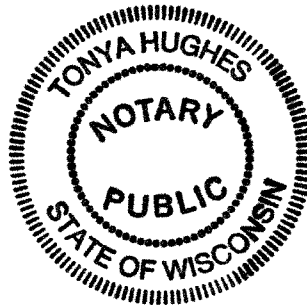

Lakeeta M. King

Date: December 7, 2004

SUBSCRIBED and SWORN before me on the 7 day of December 2004.


Tonya L. Hughes
Notary Public – State of Wisconsin

My commission is permanent



Affidavit of Lakeeta M. King

In re Lernout & Hauspie Securities Litigation, Civil Action No. 00-11589 (PBS)